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September 1, 2011

The Honorable Julius Genachowski
Chairman of the
Federal Communications Commission
Washington, D.C. 20554

Re: *Ex Parte* Communication
Proposed Transfer of Control of T-Mobile USA, Inc., to AT&T,
Inc., WT Docket No. 11-65

Dear Chairman Genachowski:

Pending before the Commission is the proposed acquisition of T-Mobile USA by AT&T, Inc. On behalf of TruePosition, Inc., we write to convey that an important public interest benefit, improved emergency response, has the potential to result from the consolidated companies. We urge the Commission to move forward with its approval of the merger.

TruePosition is a leading provider of wireless location solutions and technology. Its Uplink Time Difference of Arrival (“UTDOA”) system is the principal network based location technology deployed in the United States. The technology provides the automatic location information required by the Commission to assist emergency service agencies in finding individuals summoning help by calling 911 from a wireless device. TruePosition serves several carriers, including AT&T & T-Mobile. It has experience in deploying and maintaining E911 systems and how these systems are integrated into networks and with 911 Centers nationwide.

Our experience with AT&T indicates a steadfast commitment to network integrity and subscriber service, particularly E911. AT&T’s embrace of effective E911 service in their GSM 2G network is reflected in the adoption of UTDOA technology able to locate individuals in metal, glass and concrete structures, in urban canyons, and in other locations where competing technologies may fail. It is also apparent in AT&T’s recent announcement that TruePosition will continue to support AT&T’s E9-1-1 solution as it evolves its wireless technology with a UMTS 3G based E9-1-1 solution. Apartments, office buildings and shopping malls are critical areas where location ability of competing technologies is severely challenged.

Also indicative of AT&T's commitment are recent discussions to improve E911 service via hybrid solutions that select the best location technology for the environment. The need to locate an individual in sparse rural areas, where GPS technology excels, and in suburban and urban structures, where U-TDOA excels, since it uniquely penetrates structures, has promoted converging these location technologies into a hybrid model. AT&T and TruePosition will soon commence testing a hybrid model in AT&T's network to evaluate the extent to which advances in location technology can benefit public safety.

Moreover, this combination moves the wireless community one step closer to an optimum E-911 solution: a single GPS-UTDOA hybrid emergency location network able to be shared by all Tier 1 carriers and supporting all air-interfaces, since a single UTDOA network has the capacity and capability to do so simultaneously. This foundation could not only deliver meaningful improvements to emergency response to currently challenged environments but also contribute cost efficiencies across providers, and reflects how modern technologies can deliver improvements to important public services such as 911.

TruePosition believes that AT&T's commitment to effective networks serving all its customers, particularly in E911 service, can make a meaningful contribution to emergency response. We urge the Commission's favorable action on its application to acquire T-Mobile.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Stuart Salen', with a long horizontal flourish extending to the right.

Stuart Salen
Senior Vice President and General Counsel